

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Criminal No.
11-10286-DPW

UNITED STATES OF AMERICA

VS.

CATHERINE GREIG

DEFENDANT'S MOTION TO CONTINUE

Now comes the defendant, Catherine, Greig, in the above numbered indictment by and through counsel and moves this Honorable Court for an order permitting the trial on this matter as above captioned to be continued from the presently scheduled date of April 23, 2012 for a period of two (2) weeks to May 7, 2012.

In support of this request defendant's counsel notes that when Magistrate Boal set this Court's date for trial defense counsel's calendar was able to permit that. Unfortunately, that afternoon counsel spoke with Andrew Rainer, Assistant Attorney General who represents the government in the prosecution of the matter of Commonwealth vs. Kabraul Tasha and Commonwealth vs. Loud Fuel Company in Dukes County Superior Court (Martha's Vineyard) which matters were scheduled to commence on October 31, 2011. It was determined that as a

result of trial scheduling on other matters through no fault of defense counsel will be empanelling a jury on the murder trial of Commonwealth vs. Dylan Hodgate before Judge Robert Kane in Fall River Superior Court on October 11, 2011 and is to commence a 3 defendant multiple manslaughter trial before Judge Kenneth Fishman in Dedham Superior Court on October 24, 2011 where both of these matters have been moved up a week or two due to other trials that unexpectedly took longer to finish than anticipated. As a result of the time expected to conclude the manslaughter trial in Dedham Superior Court, Commonwealth vs. Andy Huang, the Tasha/Loud Fuel matter which involves a prosecution for hazardous waste violations must be moved from the presently scheduled trial date of October 31, 2011.

The Dukes County Superior Court only sits with jurors two months out of the year, April and October. The Tasha/Loud Fuel case was scheduled to commence on October 31, 2011 but due to the above conflicts it must be continued and in speaking with Assistant Attorney General Rainer scheduling was discussed. The first two weeks of April are unavailable. The third week is school vacation week which is not convenient to Assistant Attorney General Rainer, leaving the last two weeks of April being the only time apparently available for the trial of the Tasha/Loud Fuel case.

As a result, counsel for the defendant, Catherine Greig, is requesting that this Honorable Court continue this matter, if possible to commence on May 7, 2012 or the next date convenient to the Court as this unique session calendar in Dukes County precludes scheduling the Tasha/Loud Fuel trial anytime other than the last two weeks of April, 2012. Counsel for the defendant does not want to commence the Tasha/Loud Fuel case knowing that this Honorable Court has blocked out time for the Greig matter which may not be reached due to counsel's unavailability. As a result, counsel is filing this motion requesting a short continuance.

Catherine Greig,
By her attorney


/s/ Kevin J. Reddington, Esq.

CERTIFICATE OF SERVICE

I, Kevin J. Reddington, Esq., Attorney for the Defendant, Catherine Greig, hereby certify that the following documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on October 3, 2011.

DEFENDANT'S MOTION TO CONTINUE


/s/ Kevin J. Reddington, Esq.